

**REMARKS**

Reconsideration of this application, in view of the foregoing amendment and the following remarks, is respectfully requested.

Claims 1-48 were originally presented for consideration in this application. Claims 28 and 40 have been canceled. Accordingly, claims 1-27, 29-39 and 41-48 are currently pending in this application.

The examiner's indication that claims 11-21, 33, 34 and 36-39 are allowed, and that claims 3-8, 10, 23-31 and 41-48 contain allowable subject matter, is noted with appreciation.

The following rejections, objections, and requirements were set forth in the Office Action:

1. The drawings are objected to under 37 CFR §1.83(a) for failure to show a claimed feature;
2. Claims 4-8 are objected to for lack of antecedent basis for claimed elements;
3. Claims 1, 2 and 9 stand rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 6,056,059 to Ohmer; and
4. Claims 22, 32, 35 and 40 stand rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 5,680,901 to Gardes.

Regarding the objection to the drawings, this objection is respectfully traversed. The drawings do show a second wellbore junction having a fourth bore as recited in claim 10. Please see the example shown in FIGS. 2 and 8. FIG. 2 depicts a top view of a

wellbore junction 12, and FIG. 8 depicts a system 100 in which wellbore junctions 102, 104, 106 are interconnected to each other, the wellbore junctions 102, 104, 106 being similar to the wellbore junction 12 of FIG. 2 (see page 16, lines 11-12 of the specification).

Four bores 56, 64, 66, 68 are visible in FIG. 2. One of these is formed in an upper connection 56, which is described in the specification as being a threaded bore (see page 22, lines 6-9). In FIG. 8, an upper wellbore junction 102 is connected via a lower connection 126 with an upper connection 124 of a lower adjacent wellbore junction 104 (see page 16, lines 20-22). Thus, a third bore 68 (in the lower connection 126) of a first wellbore junction 102 is in communication with a fourth bore 56 (in the upper connection 124) of a second wellbore junction 104. The bores 68 and 56 are shown in FIG. 2.

Regarding the objections to claims 4-8, please note that claim 4 has been amended above to make it clear that the first, second and third tubular strings and the first, second and third wellbores are being introduced in claim 4 and, therefore, do not need antecedent basis in any prior claim.

Regarding the anticipation rejections based on the Gardes reference, please note that independent claim 22 has been amended above to incorporate therein the limitations of claim 28, which was indicated as being allowable. Thus, claim 22 and its dependents are now seen to be in allowable form. Independent claim 40 has been canceled, and certain of its dependents which were indicated as being allowable have been rewritten in independent form.

Regarding the anticipation rejections based on the Ohmer reference, these rejections are respectfully traversed. Independent claim 1 recites that the wellbore junction has a pressure rating of at least 50% of a pressure rating of the casing string which is connected to the wellbore junction. Ohmer contains no teaching at all

regarding the relative pressure ratings of a casing string and a wellbore junction. Instead, it is typical practice for a wellbore junction to have only a small fraction of the pressure rating of a casing string to which it is connected.

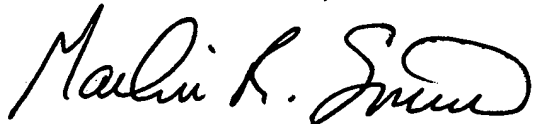
Ohmer does not teach the relative pressure ratings recited in claim 1, and does not even suggest how such an increase in the wellbore junction pressure rating could be accomplished. In contrast, the present applicant has provided in his specification specific details as to how and why his wellbore junction is uniquely capable of achieving a dramatically increased pressure rating. Since this unique feature of the wellbore junction is not described or suggested by Ohmer, the examiner is respectfully requested to withdraw the anticipation rejections based on Ohmer.

In view of the foregoing amendment and remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 1-27, 29-39 and 41-48 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

KONNEKER & SMITH, P.C.



Marlin R. Smith  
Attorney for Applicants  
Registration No. 38,310

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660 North Central Expressway  
Suite 230  
Plano, Texas 75074



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(972) 516-0030

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Sherna Stufko